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June 12, 2006

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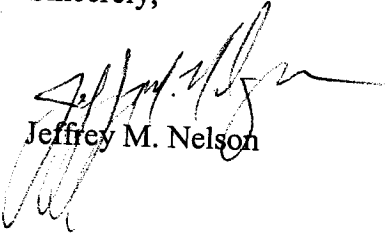
John M.S. Hoefer, Esquire
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC, 29202-8416

RE: Application of Tega Cay Water Service, Incorporated for Adjustment of Rates
and Charges and Modifications to Certain Terms and Conditions for the Provision
of Water and Sewer Service
Docket No. 2006-97-WS

Dear Mr. Hoefer:

Please find enclosed and served on you the Office of Regulatory Staff's Second
Continuing Data Requests in the above referenced matter. Please let me know if you have any
questions.

Sincerely,



Jeffrey M. Nelson

JMN/pjm

Enclosure

cc: Mr. Charles L.A. Terreni

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2006- 97 -W/S

IN RE: Application of Tega Cay Water)	
Service, Inc. for adjustment of rates)	
and charges and modifications to)	
certain terms and conditions for)	
the provision of water and sewer)	
<u>service</u>)	

**Office of Regulatory Staff's Second
Set of Continuing Data Requests**

**TO: JOHN M. S. HOEFER, ESQUIRE ATTORNEY FOR THE APPLICANT,
TEGA CAY WATER SERVICE, INC.**

INSTRUCTIONS

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175 and to 26 S.C. Code Regs. 103-853 (Supp. 2005), the Office of Regulatory Staff hereby serves its Second Set of Continuing Data Requests upon Tega Cay Water Service, Inc. (hereafter referred to as "Tega Cay" or "the Company"). The Office of Regulatory Staff hereby requests that you answer the following data requests in writing and under oath and serve the undersigned within ten (10) days after service of this Data Request at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, title, and current address and telephone number of the person. When asked to identify or provide a document, "identify" and "provide" means to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings. As used in this data request, "address" means mailing address and business address.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the requests below be labeled using the same numbers as used herein.
- C. That each of the enumerated data requests be reproduced at the beginning of each of the responses.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the data request in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- F. That all exhibits be reduced to 8 ½" x 11" format, where practical.

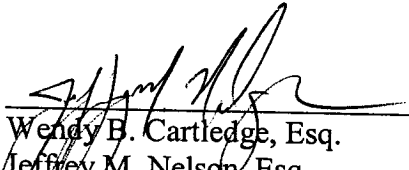
- G. That the requested information be bound in ring binders (loose leaf notebooks) or otherwise suitably bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each response be indicated.
- I. That the Company provide to the Office of Regulatory Staff two copies of the responses to this data request as soon as possible but no later than ten (10) days after service thereof.
- J. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- K. This data request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

QUESTIONS

- 2.1 Identify the names and business titles of all Water Service Corporation, Inc. personnel whose cost information is included in the Regulatory Commission Expense in response to item 1.28 of the previous data request. Provide information about their function in assisting Tega Cay.
- 2.2 Are there any Tega Cay customers with a 3-inch water meter? If so, how many and what was the water consumption for these customers during the test year?
- 2.3 What will be the reconnection charge for sewer service when an elder valve exists? Please explain.
- 2.4 The most current DHEC Drinking Water Sanitary Survey for the drinking water system provided in the response to the previous data request show an overall rating as being unsatisfactory or "U." Please explain what actions have been taken by Tega Cay or will be taken by Tega Cay to address the deficiencies identified during the last sanitary survey.
- 2.5 State the actual and projected costs of each construction and/or upgrade listed in response to 2.4.

- 2.6 Page 12 of Exhibit B of the application references 396 units with a bill code of 48524. Is this correct? Provide the address location of these taps. What is the size of these taps? What class of customers is served by these taps?
- 2.7 Provide a copy of any presentation materials that Utilities, Inc. (or its subsidiaries) have provided to Nuon USA or on behalf of Nuon USA to the parent companies of Nuon USA, including to owners of Nuon USA and its owners, in connection with the purchase of Nuon USA. Include copies of any presentations or summaries referring to Tega Cay that have been made regarding the earnings and earnings potential of Tega Cay.
- 2.8 What types of service connections are provided using the bill code "48512"? Is consumption for these customers included in the information provided in Exhibit B, page 12 of the Tega Cay application? The "Utility Billing System" information provided in response to the First Data Request, item 1.36 shows a bill code of 48512 (ex., address location: 27033 Fahleh, 29000 Windjammer, 29006 Windjammer, 29017 Windjammer, 27038 Tidal). Please clarify the use of this bill code. Include the monthly consumption information for the test year, number of bills issued per month during the test year, and any adjustments during the test year for this bill code.

June 12, 2006



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